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*Attorneys for Plaintiff (pending withdrawal)*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

## TANVIR H. RAHMAN'S DECLARATION

1 I, TANVIR H. RAHMAN, declare:

2 1. I am an attorney at law in good standing and licensed to practice law in the States of  
3 New York and New Jersey, admitted to practice in this Court *pro hac vice*, and a Partner at Filippatos  
4 PLLC. I have represented Plaintiff Zoya Kovalenko in this case, with the assistance of local counsel  
5 Hennig Kramer LLP (now Kramer Brown Hui LLP). If called as a witness, I would and could  
6 competently testify to the following facts, all of which are within my own personal knowledge.  
7

8 2. Filippatos PLLC is a law firm based in New York.

9 3. It would be a hardship for me to have to travel to Oakland, California simply to attend  
10 the hearing scheduled for March 20, 2025, in person given the length of time and expense it would  
11 take to travel cross country to and from California, as well as the disruption it would cause to certain  
12 family and childcare obligations I have.  
13

14 4. I am a practicing Muslim, and it will be a hardship for me to travel to and from  
15 Oakland, California in the present month of Ramadan while I will be fasting during daytime hours.  
16

17 5. All hearings that have taken place since Filippatos PLLC has appeared in this case  
18 have been conducted remotely without issue, including the hearing with respect to Plaintiff's Motion  
19 to Quash Defendants' Subpoenas and For Protective Order (Dkt. No. 113), which was held remotely  
20 on February 15, 2024 (*see* Dkt. Nos. 125; 146); a discovery hearing which took place remotely on  
21 October 2, 2024 (*see* Dkt. No. 143); and a Case management Conference held remotely on October  
22 8, 2024. *See* Dkt. No. 153.  
23

24 6. I have conferred with counsel for Defendants who have no objection to this request.  
25

26 7. I have conferred with Plaintiff Zoya Kovalenko who has indicated that she does not  
27 consent to this instant request because she does not believe there is good cause to request a remote  
28 hearing.  
29

8. Filippatos PLLC respectfully maintains that Plaintiff's Motion to Notice Filippatos PLLC's Termination for Cause was improperly filed with and should not be heard by this Court.

9. While she does not join in this instant request, I understand that Plaintiff Kovalenko presently resides in Maryland. She has stated in a declaration submitted to this Court that paying her outstanding legal costs incurred on her behalf by Filippatos PLLC would “impose a financial hardship on [her] given that [she has] been unemployed since being terminated in 2021.” *See* Dkt. No. 181-1, at ¶ 7.

10. I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Dated: March 3, 2025

Respectfully submitted,

## FILIPPATOS PLLC

By: /s/ Tanvir H. Rahman  
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